

APR 24 2019

(USAO GAN 6/10) Search Warrant

JAMES N. HATTEN, Clerk

Karen Bill

United States District Court

NORTHERN DISTRICT OF GEORGIA

In the Matter of the Search of

4262 Apache Drive, Acworth, Georgia, a single-family house with an attached two-car garage described in detail in Attachment A.

**APPLICATION AND
AFFIDAVIT FOR
SEARCH WARRANT**
Case number: 4:19-MC-15-WEJ
UNDER SEAL

I, James E. Rives, being duly sworn depose and say:

I am a Special Agent of the Immigration & Customs Enforcement, Homeland Security Investigations and have reason to believe that in the property described as:

4262 Apache Drive, Acworth, Georgia, a single-family house with an attached two-car garage described in detail in Attachment A.

in the Northern District of Georgia there is now concealed certain property, namely,

See Attachment B,

which constitutes evidence of a crime and contraband, fruits of crime, or items illegally possessed, concerning violations of Title 8, United States Code, Section(s) 1324(a)(1)(A)(iii) & (iv); Title 18, United States Code, Section(s) 922(g)(5); Title 18, United States Code, Section(s) 1956 (a)(1); and Title 18, United States Code, Section(s) 1957(a). The facts to support a finding of Probable Cause are as follows:

SEE ATTACHED AFFIDAVIT

Continued on attached sheet made a part hereof.

Sworn to before me, and subscribed in my presence

April 24, 2019
Date

WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer
AUSA William G. Traynor

James E. Rives
Signature of Affiant

James E. Rives

Rome, Georgia, Georgia
City and States

Walter E. Johnson
Signature of Judicial Officer

AFFIDAVIT OF HSI SPECIAL AGENT JAMES RIVES

I, James Rives, being duly sworn, depose and state:

Introduction

Juan Antonio Perez and his wife, Eva Torres, are natives and citizens of Mexico who have been in the United States illegally for many years. During this time, Perez has built a successful and lucrative residential construction business, Aztec Builders d/b/a Aztec Framing. This investigation has learned that one reason for Aztec's profitability is that Perez and his subcontractors employ illegal aliens for whom no payroll taxes are withheld and who receive no insurance or other benefits. Perez has built a compound-like home in a remote corner of Bartow County, Georgia. He owns several other properties and has amassed a collection of expensive vehicles. Because Perez is not an American citizen, he requires the help of citizens to register his vehicles in their names, register electrical and other utilities in their names, and obtain firearms for him.

As developed below, this investigation has found probable cause to believe that Perez's home, business offices, and other properties now contain evidence of the violation of federal laws, including alien harboring for commercial advantage and private financial gain, in violation of 8 U.S.C. § 1324(1)(1)(A)(iii) & (iv) and (B)(i), and being an illegal alien in possession of firearms, in violation of 18 U.S.C. § 922(g)(5).

Additionally, alien harboring is a “specified unlawful activity” as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(F). Thus, is probable cause to believe that Perez has conducted financial transactions with the proceeds of that specified unlawful activity, in violation of the money laundering statutes at 18 U.S.C. §§ 1956(a)(1) and 1957(a).

Finally, there is probable cause to believe that Perez’s houses and business offices now contain evidence of all these offenses, contraband, and fruits of these crimes.

Agent Background

I have been a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE) for over eleven years. Before I joined ICE, I was a police officer with the Alpharetta Police Department for about seven years. I completed the Special Agent Training Course at the Federal Law Enforcement Training Center in September 2007, where I received training in immigration law, nationality law, and criminal law. I have continued to receive training in legal and investigative matters. I work in the ICE office in Dalton, which is in the Northern District of Georgia. I investigate, among other things, violation of federal immigration and firearms laws.

This affidavit is based on my observations, training, and experience, and information obtained from other law enforcement investigators and witnesses. This affidavit is also based on the review of bank

records, and records received from state law enforcement, tax, and vehicle registration agencies.

This affidavit is also based on sworn testimony that Perez gave in a deposition in the civil case of *Leroy Williams v. Rosendo Ramirez-Guzman and Aztec Builders Inc., d/b/a Aztec Framing*, Case No. 14C444 (Hamilton County Circuit Court, Hamilton County, Tennessee). That case involved a car wreck in which one of the drivers, Ramirez-Guzman, painted houses for Aztec Framing. Perez was deposed under oath on August 7, 2015. He explained his business operations in the deposition. He also explained that he came to this country illegally from Mexico in about 1990. This affidavit is also based on information obtained from Aztec Framing's website, <http://aztecframing.net/>.

This affidavit is intended to show that there is probable cause to believe that Perez's home and properties, identified below and listed in detail in Attachment A, now contain evidence of the violation of federal immigration and firearms laws. I intend to establish probable cause in this affidavit, and not to set out all of the information that has been developed in this investigation.

Properties

Except for the Aztec Framing office in Hixson, Tennessee, all of the properties described below are in the Northern District of Georgia:

Perez, his wife Eva Torres, and their children live in a compound-like house Perez built in 2007 at 404 Folsom Glade Road in rural Rydal

in Bartow County. Perez built the house in a remote site, with access so limited that it can be surveilled surreptitiously only by helicopter. The house is surrounded by a tall wall and gate, and utility and other workers who have had access to the grounds report that armed guards patrol inside the wall. According to information from the Bartow County Board of Assessors, the house has 7,543 square feet of finished space on two floors, with 5½ bathrooms. As of January 10, 2014, the county valued the house at \$680,900. The property includes two multi-car garages where Perez stores some of his many vehicles. As developed below, Perez's friends report that he collects firearms and keeps some in a safe in his home.

Aztec Framing has three business offices at these addresses:

- 1) 1325 Cassville Road, Cartersville;
- 2) 1641 Lafayette Road, Rossville; and
- 3) 1027 Lower Mill Road, Hixon, Tennessee.

Perez also owns a house at 375 Boulder Road, in Kingston. He calls this his "fun house" or "toy house," where he stores vehicles and other expensive "toys," and spends time with women other than his wife.

Perez also owns a house at 4262 Apache Drive in Acworth. Perez harbors illegal aliens in this house, in that he rents it to illegal aliens who work for him through Aztec Framing. Both Perez and Torres have listed this address as their home address on Georgia driver's licenses.

Financial Investigation and Bank Accounts

As Perez testified in his deposition, and as the investigation has learned from other sources, he is the primary employee of Aztec Framing, meaning that he finds the jobs, writes the checks, keeps the books, and hires the subcontractors and laborers for the company's construction jobs. Perez testified that over the years he has had about a half-dozen employees. He paid them on a daily rate, or by-the-job, as they worked for him. Even for the people he deemed his "employees," Perez did not withhold payroll taxes, Social Security taxes, or keep any records other than check stubs. As for the laborers, Perez either pays them directly with weekly checks, or he pays subcontractors by-the-job, who then pay their laborers. Perez testified that he keeps his payment and business records in his business offices in Georgia, his office in Tennessee, and his laptop computer.

By paying illegal aliens at below-market rates, not providing them any benefits to them or any other employees, and not withholding and paying over payroll taxes, Perez has made substantial amounts of money. Yet as of April 2019, the Georgia Department of Labor has no record of any income reported by Perez. Several of Aztec Framing's business accounts are held at PNC Bank, as well as two personal accounts. Perez is the signer on all of these accounts. Below is a summary of the accounts identified throughout this investigation.

PNC Bank Account #1

On or about April 25, 2011, PNC Bank business checking account 5325793611 was opened for Aztec Builders Inc. and appears to be used as a Payroll account ("SUBJECT ACCOUNT 1"). Perez is the authorized signer on this account. The address associated with this account is 4262 Apache Drive, Acworth. This account is funded by various contracting companies and individuals. In December 2016, a total of approximately \$756,087.69 was deposited into the account, and approximately \$620,197.04 was deducted via checks and online account transfers. Approximately \$60,000.00 in funds were transferred to PNC Bank account 5342456393 (an additional Aztec Builders Inc. Payroll Account), and \$40,000.00 was transferred to PNC Bank account 5325793603 (Aztec Builders Inc.).

Between March 2016 and March 2017, there were several large checks written to the same individuals for even amounts. For instance, Enrique Perez received \$563,449.99 in checks from this account during this time frame. Checks to him ranged from \$10,000.00 to \$54,500.00. Jose Gayton received \$371,508.00 in checks from this account during this time frame. His checks ranged from \$10,500.00 to \$19,408.00. Jose Escalona received a total of \$199,086.25 in checks from this account during this time. His checks ranged from \$10,065.00 to \$17,520.50.

Between June 2018 and October 2018, 320 checks, ranging from \$2,500 to \$59,272, totaling \$2,367,909 were issued through this account.

Between October 2, 2018 and January 8, 2019, deposits into this account totaled \$3,404,724.75. Deductions from this account include 353 checks, ranging from \$130.00 to \$57,098.50, that were issued to various individuals totaling \$2,050,740.51. Many of these checks are in round dollar amounts. These checks include payments to Perez's subcontractors and crew bosses, including Juan Carlos Landaverde-Compean, who was interviewed by agents in March 2018. Details of this interview are set forth under the Employee section of this affidavit.

PNC Bank Account #2

On or about January 12, 2015, PNC Bank business checking account 5342456393 was opened for Aztec Builders Inc. as a payroll account ("SUBJECT ACCOUNT 2"). Perez is the authorized signer on this account. The address for this account is 4262 Apache Drive, Acworth. This account is funded by online transfers from account SUBJECT ACCOUNT 1. In April 2016, numerous checks were written to individuals with "labor" documented in the memo line. One of the individuals paid numerous times is Abigail Infante, who resides in 4262 Apache Drive in Acworth. Infante was paid four times during the month, approximately seven days apart, and included three checks for \$780.00 and one check for \$800.00. Ariel Barrientos received three checks during April 2016 totaling \$15,698.90. Checks written during the month of April from this account totaled approximately \$116,005.00.

Between October 2018 and January 2019, a total of 51 checks were issued from this account ranging from \$800.00 to \$7,490.36, totaling \$112,175.00. These checks were paid to Abigail Infante, Fernando Infante, Cesar Cornejo and other laborers and most of the checks referenced "labor."

PNC Bank Account #3

On or about September 16, 2002, Perez opened personal checking account number 5326131118 ("SUBJECT ACCOUNT 3"). Both Perez and Eva Torres are signers on this account. This account is funded from transfers from SUBJECT ACCOUNT 2 and SUBJECT ACCOUNT 4 (both business accounts). This account appears to be used for everyday living expenses, with a few checks to individuals for even dollar amounts.

PNC Bank Account #4

On or about April 22, 2011, PNC Bank business checking account 5325793603 was opened for Aztec Builders Inc. ("SUBJECT ACCOUNT 4"). Perez is the authorized signer on this account. The address associated with this account is 4262 Apache Drive, Acworth. This account is funded through online transfers from SUBJECT ACCOUNT 1 and SUBJECT ACCOUNT 5. On April 8 and April 29, 2016, Perez wrote two checks to Ron Lane for \$5,0000 each. In the memo section of the checks, it referenced "car payment." A total of

\$65,653.23 in checks were withdrawn on this account during April 2016.

In August 2018, a transfer was made into this account from SUBJECT ACCOUNT 1 for the amount of \$850,000.00. The transferred funds were used to purchase a cashier's check for \$844,561.00 payable to Jones Raulston Title Insurance Agency. A check for \$10,000.00 was drawn from this account to Real Estate Partners of Chattanooga, referencing "property earnest money 1653 Cloud Springs Rd."

Between October 2018 and January 2019, 13 checks were issued from this account, totaling \$13,617.11. One of these checks was payable to Juan Jose Vega, referencing "2 weeks pay." Numerous checks were issued to Cesar Cornejo, most of them referencing "receipts."

PNC Bank Account #5

On or about April 22, 2011, PNC Bank business savings account 5326103854 was opened for Aztec Builders Inc. ("SUBJECT ACCOUNT 5"). This account was opened on December 31, 2008. This account had a balance of \$741,009.96 in December 2018.

During the investigation, I learned that Perez/Aztec Framing also maintains the following other bank accounts with PNC Bank:

- Personal savings account 5326106262 – this account had a balance of \$36,634.23 in December 2018;

- Business checking account 5326103619 – this account had a balance of \$571.21 in December 2018; and
- Business checking account 5325793531 – this account had a balance of \$4,605.76 in December 2018.

PNC Certificate of Deposits

Aztec Framing Contractors, Inc. and Aztec Builders Inc. have three Business Certificate of Deposit accounts with PNC Bank. Account number 11020710238 had a balance of \$52,952.07 as of December 2018. Account number 11020710329 had a balance of \$3,202.03 of December 2018. Account number 11020708171 had a balance of \$10,502.40 in December 2018.

Vehicles

Perez has used his wealth to indulge his taste for expensive vehicles, ranging from expensive, limited-edition Ford Raptor pickup trucks to classic muscle cars to contemporary sports cars, including Porsches and a Nissan GTR. The investigation has found that Perez owns dozens of such vehicles, all of which are registered in other peoples' names including, as developed below, Jorge or Vanessa Cabanas, or Jeff Espinoza. Few if any of these vehicles would be of any practical use for a construction business. Perez stores many of these vehicles in the three- and four-car garages that he has added to most of his properties, including two to his home. Several of these garages are

equipped with lifts that double their holding capacity by making it possible to store two vehicles in each bay.

Helpers

Perez has several people who help him by doing things for him in their names. Two of his helpers are **Jorge** and **Vanessa Cabanas**. They are citizens of Mexico and legal permanent residents in the United States. They operate Tarasco's restaurant in a building that Perez owns at 1325 Cassville Road in Cartersville. One of Perez's offices is behind the restaurant and uses the same street address. In April 2013, investigators learned that Tarasco's was writing weekly checks for men who worked for Perez/ Aztec. The payroll checks totaled several thousand dollars every week.

In an interview in March 2014, Jorge and Vanessa Cabanas explained that they are close friends with Perez. They said they have used their names to purchase and register vehicles for Perez because he has no immigration status in the United States and, therefore, cannot register vehicles in Georgia in his name. The Chevrolet vehicles they have purchased and registered for Perez include Corvette and Camaro sports cars, a Tahoe SUV, and a Silverado pickup truck. (Investigators have seen Perez driving these vehicles, but never the Cabanases.) Jorge Cabanas also registered a Ford Raptor pickup truck that Perez regularly drove for years.

Jorge Cabanas said he had also purchased a firearm for Perez. In this and later conversations, Cabanas said that Perez made it clear in several conversations that he was interested in firearms and he collected them. Cabanas said he had not seen Perez' firearms collection, but he had seen large gun safes in Perez's home at 404 Folsom Glade Road in Rydal.

Vanessa Cabanas told me that she works as Perez's unofficial administrative assistant, doing banking and bookkeeping for him, and other administrative tasks. She said that Perez has been so successful financially because Aztec Framing uses illegal aliens who are paid below-market wages. She said Perez also overstates their wages on his IRS tax forms to reduce his business income taxes. She estimated that Perez had about 200 employees, all or nearly all of whom were illegal aliens. Jorge and Vanessa Cabanas volunteered to cooperate with law enforcement agents in investigating Perez, but then they warned Perez of the investigation, forcing agents to suspend the compromised investigation.

Jorge and Vanessa Cabanas said they knew it was against the law for them to purchase and register vehicles for Perez, but they did so because of their friendship. Jorge Cabanas said that he once owned a house at 85 Kingston Hwy 293 in Cartersville, but he sold it to Perez to pay the debt he had generated running Tarasco's. As of late September 2018, the Cabanases operated two restaurants in Cartersville, Tarasco's

and Tacos and Wings. The Bartow County Tax Assessors list Aztec Framing as the owner of Tarasco's property. According to the Georgia Corporation search, Vanessa Anne Cabanas is the CFO, CEO and Secretary of Tacos and Wings.

The Cabanases are still operating a partnership with Perez, and the three are frequently seen together at Tarasco's.

* * *

Jeff Espinoza is another of Perez's helpers. He is a native of Mexico who naturalized as a United States citizen on June 14, 1996. Espinoza first came to agents' attention in November 2014, when they saw Perez's wife, Eva Torres, driving a Mini Cooper that was registered to Espinoza, who registered it using the home address of the 85 Kingston Hwy 293 house that Jorge Cabanas sold to Perez. Agents learned that Espinoza was the nominal account holder for the utilities for some of Perez's other properties, including a house at 375 Boulder Road in Kingston, Georgia, that Perez bought from Ashley Black.

On January 17, 2015, a Bartow County Sheriff's Deputy stopped Perez for speeding. Perez identified himself with an expired Georgia driver's license that listed his home address as 4262 Apache Drive in Acworth — which is the house that Perez provides to some of illegal aliens who work for him. The deputy arrested Perez for driving with a suspended license. At the jail, he listed his home address as 404 Folsom

Glade Road in Rydal. Espinoza came to the Bartow County Jail and paid Perez's bond.

Perez's testimony about Espinoza: Perez testified in his August 2015 deposition that Espinoza as one of the five or six people he considered to be employees of Aztec Framing. Perez testified that Espinoza was a superintendent who inspected work by Aztec's crews or subcontractors. Perez testified he paid Espinoza \$200 for each day he worked. Perez testified that he did not withhold employment taxes or Social Security payments from Espinoza's payments. Perez testified that Aztec did not provide Espinoza a vehicle.

A Form I-9 is the federal Employment Eligibility Verification form. Federal law requires employers to verify the identity and legal authorization to work of all paid employees. Federal law requires employers to ensure the proper completion of a Form I-9 for every individual they hire for employment in the United States. In his deposition, Perez testified that he did not know what a Form I-9 is. Not surprisingly, Perez testified that he did not require Espinoza or any other Aztec employee to complete a Form I-9.

Espinoza's statements: In an interview in November 2015, Espinoza told agents that he had worked at Aztec Framing for about four years. He said he did administrative duties, such as payroll and paying invoices. He said he obtained utilities for properties in his name because Perez could not obtain them because he was an illegal alien.

Agents met with Espinoza again in September 2017. He said that he had recently stopped working for Perez. He acknowledged that while he owns two vehicles, there are more than fifteen registered under his name in Georgia, including Torres' Mini Cooper and a Dodge Ram pickup truck that Perez drives. Espinoza explained that Torres is his cousin, and he registers vehicles and other things for Torres and Perez because neither has any valid identification documents. He said that when he worked for Perez, he often did personal tasks for Perez instead of supervising Aztec Framing jobs. Those tasks included registering vehicles, utility accounts, and properties for Perez.

Espinoza also said that Perez collects firearms, and has large firearm safes in his house at 404 Folsom Glade Road in Rydal and his "fun" house located at 375 Boulder Road in Kingston.

Agents met Espinoza again about six weeks later, in October 2017. Espinoza said that Perez has a small number of "team leaders" he pays lump sums per job. The team leaders then hire laborers for Aztec Framing jobs. Most of the laborers are illegal aliens, Espinoza said. This is a highly profitable business for Perez, Espinoza said, because the laborers' share of the lump sums paid to team leaders is less than the minimum wage, and they do not receive any sick or vacation time or any other work-related benefits.

Espinoza said that Perez keeps Aztec Framing's business records — check books, tax records, contracts, etc. — at four locations:

- 1) Perez's house at 404 Folsom Glade Road, Rydal;
 - 2) the Aztec business office at 1325 Cassville Road, Cartersville;
 - 3) the Aztec business office at 1641 Lafayette Hwy in Rossville;
- and
- 4) the house at 375 Boulder Road in Kingston.

* * *

In addition to Jorge and Vanessa Cabanas and Jeff Espinoza, agents have identified **Ashley Black** as something of a "helper" to Perez. On or about November 5, 2015, Black sold Perez his house at 375 Boulder Road in Kingston, along with all its contents and an unknown number of vehicles. The house is a large single-story ranch house with at least three bedrooms and a front porch that runs almost the entire length of the front of the house. The driveway leading to the house is gated, making roadside surveillance impossible. But aerial surveillance revealed that the property includes an outdoor swimming pool, and another structure directly behind the main house. This structure appears to be a covered entertainment area, possibly a kitchen, with a small dwelling attached. There is also a separate three-car garage that is not attached to the main house; it is across the driveway from the main house and the pool. There are also two barns on the property that are big enough to store several vehicles. Vehicle tracks could be seen going into the barns from the aerial surveillance.

Due to the untraditional matter that Perez negotiated the sale of the house, it is impossible to determine the sales price. Black and Perez negotiated the price, and then Perez paid him with several checks, each written in amounts between \$30,000 and \$50,000. In the memo line on the checks, Perez wrote "375 Boulder Road." In an interview on August 13, 2018, Black said that Perez calls the house on Boulder Road his "fun" house, meaning that he spends his weekends there. Black said Perez stores some of his vehicles at the house.

Black described himself as a "trader." As an example, he said that he once bought a Porsche sports car from Perez for \$90,000. About three days later, Perez said he could not find another Porsche like that one, and he wanted to buy it back. Black sold it back to him for \$70,000, taking a loss of \$20,000. Black said he trades with Perez, and he would make up the loss in another trade by buying an asset from Perez below its market value. When I told Black that his "trading" with Perez appeared to be a form of money laundering, he simple stated that he was a "trader."

Black said he knew that Perez conducted Aztec Framing's business and stored vehicles in his office behind Tarasco's restaurant at 1325 Cassville Road in Cartersville. Black said he knew that Perez also worked from the Aztec offices at 1641 Lafayette Hwy in Rossville and 1027 Lower Mill Road in Hixon, Tennessee. Black said that Perez occasionally works from his home at 404 Folsom Glade Road in Rydal.

Black said that Perez was interested in firearms, and he had sold a rifle to Perez after Perez had expressed an interest in it.

Employees

In the past few years, agents and law enforcement officers have had contact with several of Perez's employees under a variety of circumstances. In every case, the employee has been in the United States illegally. On June 9, 2014, a Bartow County sheriff's deputy stopped **Juan Carlos Taboada-Chavez** for a traffic violation. Taboada was driving a Chevrolet Silverado pickup truck that was registered to Espinoza. He was stopped soon after he left the house at 85 Kingston Hwy in Cartersville that Perez bought from Cabanas. The deputy arrested Taboada for driving without a driver's license. Taboada admitted to being in the United States illegally. He said he was an employee of Aztec Framing. He said he had worked for Perez for more than a year, and he was paid a lump sum every week. He said his job was to deliver construction materials to Aztec Framing project sites, and most of the sites he visited were in Tennessee. Taboada said Perez knew he was in the United States illegally.

On September 22, 2015, a Bartow County sheriff's deputy stopped **Ramon Hernandez-Ramirez** for a traffic violation. Hernandez was driving a white van with the word "Roofing" on the side. Hernandez gave the deputy a Georgia driver's license that had expired several years earlier. When the deputy asked about the license, Hernandez

said he was in the United States illegally and could not get another license. Hernandez lived in the house at 4262 Acworth Drive in Acworth that Perez owns and provides to some of his laborers. Hernandez said he paid Perez monthly rent of \$900 to live in the house with his wife and two children.

When I interviewed Hernandez later that day, he told me that he was a self-employed roofer who worked exclusively for Perez on Aztec Framing jobs. He said that Perez paid him weekly by check. Aztec bank records show that between December 21, 2013 and November 22, 2014, Aztec paid him a total of \$72,246.73. The Aztec payroll checks listed the business address as 404 Folsom Glade Road in Rydal — Perez's home.

More recently, on March 12, 2018, agents interviewed **Juan Carlos Landaverde-Compean** at his home in Cartersville. We wanted to speak with him after a review of Aztec Builders' bank accounts showed that Perez wrote checks to **Landaverde** that totaled about \$250,000 in 2017. Landaverde said that he was a house framer for Aztec Builders, and he worked for Perez. He said he was in the United States illegally, and Perez knew that. He said he usually worked 7:00 a.m.-8:30 p.m., Monday-Saturday. He said he is a "crew boss" for Perez, meaning that it is his responsibility to pick up five workers and bring them to Aztec work sites. Landaverde said he also recruited laborers for Perez, and they were usually in the United States illegally. He said there were no

eligibility requirements to work for Perez, and he did not provide any benefits other than weekly pay — no overtime pay, no vacation or sick leave, and no insurance. He said Perez has several crew bosses.

There was a white cargo van with a Tennessee license plate in Landaverde's driveway. It was registered to Aztec Builders, 1027 Lower Mill Road in Hixon, Tennessee. Landaverde said he did not work for anyone other than Perez, because Perez always had enough work for him.

In his deposition in August 2015, Perez testified that Landaverde was, like Jeff Espinoza, one of the few people he considered to be an employee of Aztec Builders. He described Landaverde as a framer, and said that he had worked for Aztec Builders "off and on" for the preceding ten years. Perez testified that he paid Landaverde \$160 per day regardless of the number of hours he worked. Perez said that like Espinoza and his other employees, Landaverde did not fill out an application or an I-9 form, and Aztec did not withhold any taxes or Social Security from his paychecks. Perez testified that Landaverde's and his other employees' employment files and check stubs would be stored in the Aztec office on Lower Mill Road in Hixon, or the Aztec office at 1641 Lafayette Road in Rossville.

Aztec Builders Today

As of April 23, 2019, Aztec Builders is still a very active and profitable company doing business as it has done for years in North

Georgia and Tennessee. The company advertises their business locations at 1641 Lafayette Road in Rossville, 1325 Cassville Road in Cartersville, and 1027 Lower Mill Road in Hixon, Tennessee. Perez still provides the house at 4262 Apache Drive in Acworth to some of his employees, who are illegal aliens. And Perez still maintains his fun house at 375 Boulder Road in Kingston.

Juan Perez is still operating the business as of April 2019 as he has throughout the investigation. Agents have continued to see Aztec Framing workers at various job sites building house throughout North Georgia and Tennessee. Occasionally, Aztec workers are also encountered by immigration officials at the local jails after committing minor criminal offenses.

Perez's family still lives at 404 Folsom Glade Road in Rydal. Eva Torres is listed as the owner according to the Bartow County Tax Assessor, and according to the Floyd County Tax Assessor, Perez is the owner of 375 Boulder Road in Kingston.

Conclusion

Based on the foregoing, there is probable cause to believe that Juan Antonio Perez has committed and is committing the offenses of harboring aliens for his commercial advantage and private financial gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (iv) & (B)(1); is an illegal alien in possession of firearms, in violation of 18 U.S.C.

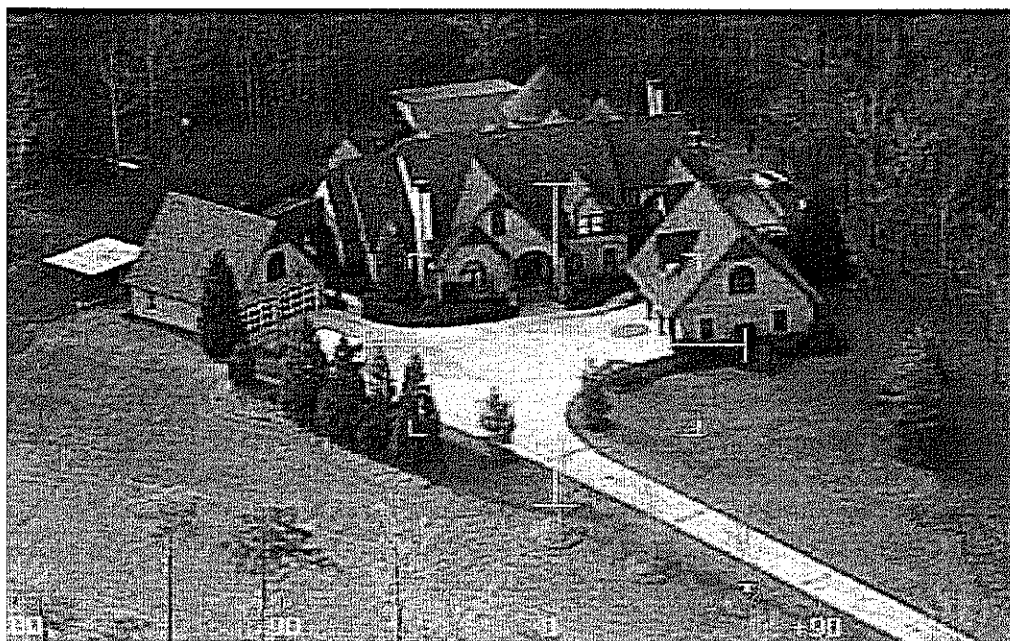
§ 922(g)(5); and has committed money laundering violations of 18 U.S.C. §§ 1956(a)(1) and 1957(a).

There is also probable cause to believe that the properties listed below and in Attachment A now contain evidence of these crimes and contraband, fruits of crime, or items illegally possessed, concerning these violations.

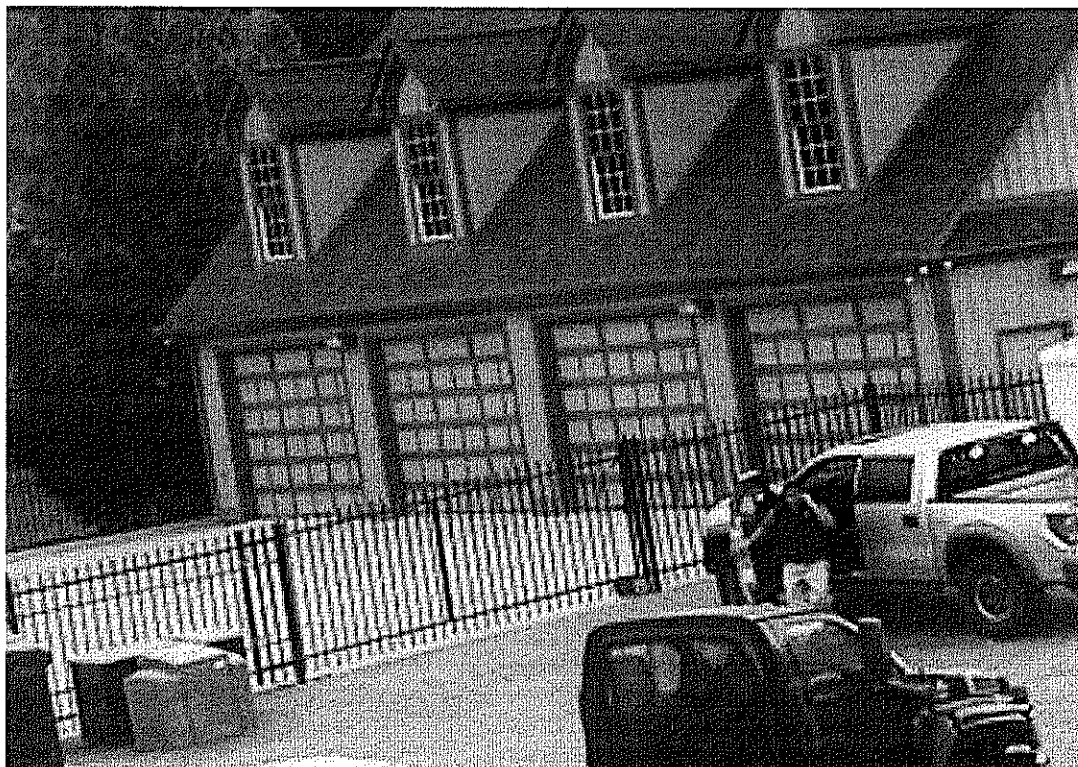
Attachment A

Describe these properties, all of which are in the Northern District of Georgia:

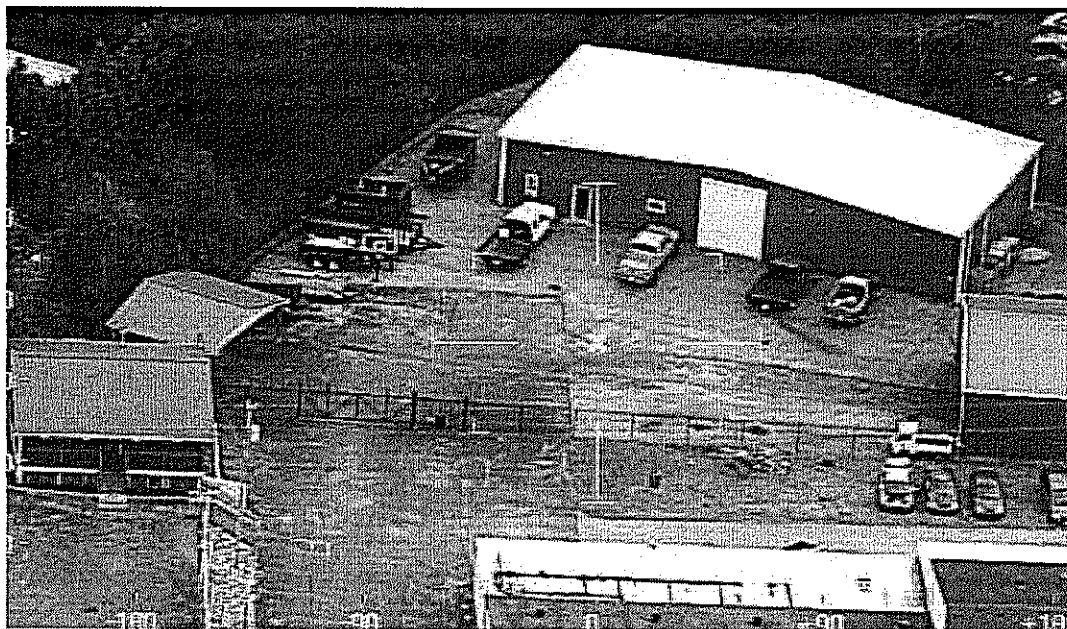
- 1) 404 Folsom Glade Road, Rydal, Georgia is a large single-family, three-story residence shown below. The exterior is brick with brown trim. There are two separate two-car garages located on both sides of the residence. There is a structure in the back of the residence that has a red roof that appears to be an entertaining area that contains an outdoor kitchen. A basketball court is also located on the property next to the residence.



- 2) Aztec Framing office and garage at 1325 Cassville Road, Cartersville, Georgia; this structure shown below is a four-car garage that appears to be two stories. There is a door on the side of the building that leads to an office area. The building is wrapped with tan siding with dark brown trim.



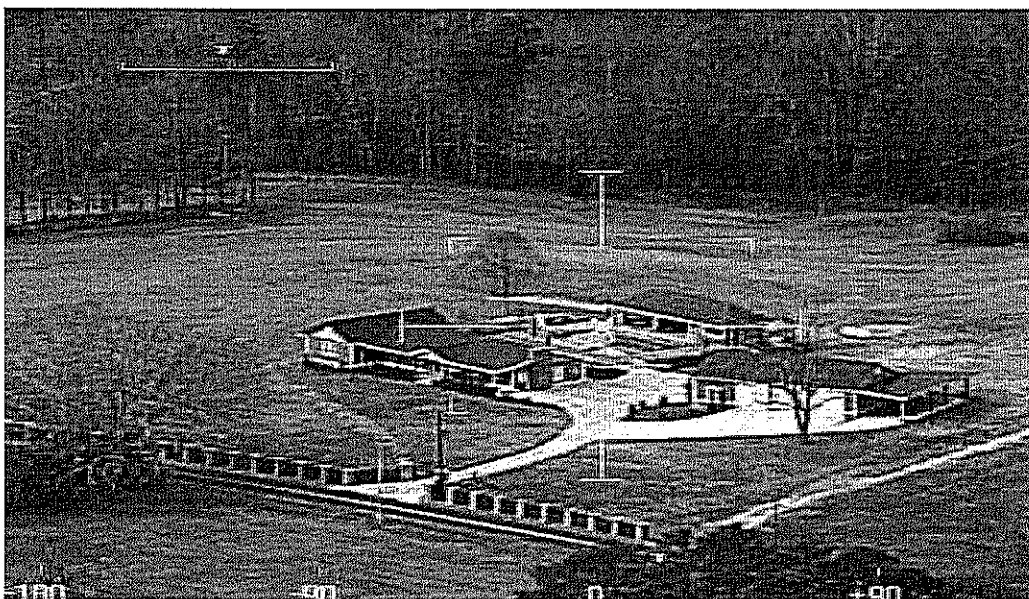
- 3) Aztec Framing office and garage at 1641 Lafayette Road, Rossville, Georgia; the office, shown below, is a two-story structure with the first floor painted white, and the second-floor painted maroon. The office has a blue roof and a front porch that runs the length of the building. There are two garages located in the back of the property. One garage is large maroon building with a white roof, roll up door and front door. There is a smaller garage to the side of the large garage that is red (including the roof) with white trim.



4) 4262 Apache Drive, Acworth, Georgia; is a single-family dwelling shown below with an attached two-car garage with a white garage door. The front of the house has tan siding, and an entry way that leads to a dark front door. The door has a decorative oval glass. There is an unattached two-car garage in the backyard of the residence. The garage is wrapped in tan siding and has white garage doors.



5) 375 Boulder Road, Kingston, Georgia; is a large single-story ranch style house shown below, with at least three bedrooms, and a front porch that runs almost the length of the front of the house. The driveway leading to the house is gated; however aerial surveillance revealed a pool with another structure directly behind the main house. The structure appears to be a covered entertainment area, possibly a kitchen, with a small dwelling attached. This dwelling appears to be a guest house or an addition living area to the main house. There is also a separate three-car garage that is across the driveway from the main house and the pool. The property also includes two large barns sit on the property that are big enough to store multiple vehicles. The house sits on 17.53 acres.



Attachment B

The items to be seized from within the properties listed in Attachment A are evidence of violations of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (iv) & (B)(1); 18 U.S.C. § 922(g)(5); and 18 U.S.C. §§ 1956(a)(1) and 1957(a) specifically:

(1) Payroll ledgers, checkbooks and check stubs, bank records, address and/or telephone books and papers reflecting names, addresses, and/or telephone numbers, written or typed by hand and/or correspondence which may relate to knowingly encouraging or inducing an alien to reside in the United States by providing residence and/or employment for the purpose of commercial advantage or financial gain;

(2) Books, letters, records, computerized and electronic records, cellular telephones, pagers, safe deposit box keys, which may relate to harboring and/or employing aliens;

(3) Indicia of occupancy, residency, and/or ownership of the premises described above and other real property, including but not limited to deeds, utility and telephone bills, canceled envelopes and keys;

(4) The visual image, by way of photography, of all furnishings and equipment in, on, under, attached, or appurtenant to said premises;

(5) Papers, tickets, notes, schedules, receipts, passports, immigration and identity documents and other documents of employees and/or subcontractors;

(6) Firearms, firearms parts, and ammunition;

(7) United States currency in excess of \$500;

(8) Any records or computers (including file servers, desktop computers, laptop computers, mainframe computers, and storage devices such as hard drives, zip disks, flash drives, CD ROMS, DVDs, and floppy disks) and any other storage media that was or may have been used as a means to create or store identification documents, employment records, Employment Eligibility Verification forms (Form I-9), rent payments, bank statements, tax records, employee records, business records and payroll. The term "records" includes all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any electrical, electronic, or magnetic form (such as any information on an electronic or magnetic storage device, including floppy diskettes, hard disks, flash drives, zip disks, CD-ROMS, DVD, optical discs, backup tapes, printers, printer buffers, smart cards, memory calculators, cellular phones, pagers, personal digital assistants such as Palm Pilot computers, as well as printouts or readouts from any magnetic storage devices); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic

form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, photocopies); and

(9) Any and all other material evidence of violations of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (iv) & (B)(1); 18 U.S.C. § 922(g)(5); and 18 U.S.C. §§ 1956(a)(1) and 1957(a).